

October 25, 2019
Via ECFS Filing

Secretary, Federal Communications Commission
Washington, DC 20554
ATTN: Wireline Competition Bureau

RE: Talk America Services, LLC – WC Docket No. 19-263
Application to Discontinue Service – Response to Jones Comment

Dear Ms. Dortch:

Please accept this letter submitted on behalf of Talk America Services, LLC (“Company”) providing supplemental information in response to comments submitted in the above-referenced docket by Ms. Margorie Jones, a Talk America Services customer. Ms. Jones expressed concerns about being unable to replace the service currently provided by Talk America Services with a comparable service using copper lines.

As an initial point of clarification, Ms. Jones commented that the notice that she received from Talk America Services regarding the discontinuance was dated August 30, 2019 and that she did not receive it until September 27, 2019. The notice she attached to her comments is a word document with no customer address information and was not the notice that was mailed to Ms. Jones by Talk America Services. The actual notice was dated and mailed on September 9, 2019. The final form of the notice is attached hereto.

As to her substantive concerns, Ms. Jones identified several reasons why she wishes to retain telecommunications services provided over copper facilities, rather than switch to alternatives such as Verizon’s FIOS offering. She has apparently been unable to locate an alternative provider, including Verizon, who will provide a copper-based service, in large part because Verizon’s records do not show copper to her residence, a finding that Ms. Jones disputes.

Unfortunately, Talk America Services has no control over the service alternatives available from other providers. Deregulation in both federal and state jurisdictions, coupled with policies that encourage the transition of facilities away from copper, have resulted in fewer alternatives for customers who prefer copper-based wireline services. Talk America Services emphasizes that it is not discontinuing the provision of services because it is choosing to do so—rather, due to the unavailability of inputs from its wholesale provider it will be legally unable to continue to provide services in the coming months. The Company is taking every effort to ensure an orderly transition for affected customers and has contacted Ms. Jones directly on October 17, 2019, to attempt to assist her. To date, Ms. Jones has not returned the Company’s call. The Company’s above-referenced application should not be delayed or denied because of provisioning decisions by other carriers that negatively impact consumers’ ability to find the specific wireline voice service alternatives they prefer.

Talk America Services regrets the inconvenience to Ms. Jones and other customers who it will no longer be able to serve. The company is providing as much assistance as possible to help them find and transition to alternative providers.

Sincerely,

/s/ Sharon Thomas

Sharon Thomas
Consultant



September 9, 2019

Customer Name
Customer Address
City, State Zip

URGENT: Your telephone services will be impacted unless you take action before October 30, 2019!

Dear Valued Customer,

Talk America Services, LLC will discontinue offering local exchange (dialtone), digital subscriber line (DSL) internet access and intrastate and interstate long distance services to all customers in the state of New Jersey on or after October 30, 2019, pending applicable regulatory approvals. **Your service will be affected by this discontinuance.**

To avoid a **permanent disruption of your telephone services**, please contact Talk America Services at 1-800-962-4772 as soon as possible to discuss your available options for selecting an alternative service provider. Failure to do so may result in insufficient time to transition your services to an alternative provider. If you subscribe to our local services, you could lose your dialtone, including your telephone number, with no short-term ability to restore them. If you subscribe to our internet access or long distance services, you will experience loss of those services if you fail to transition to another provider or providers before October 30, 2019. Therefore, you will need to migrate the services you now receive from Talk America Services to an alternative provider before **October 30, 2019.**

You can usually find a list of local telephone service providers in your local telephone directory or on the Board of Public Utilities' website at www.bpu.state.nj.us. If you require assistance, please contact Talk America Services at 1-800-962-4772.

A filing is being made with the FCC for approval of this discontinuance of service. The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the \$63.71 Application of Talk America Services, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

You may contact Talk America Services directly to obtain information about this discontinuance. Talk America Services' customer service can be reached at 1-800-962-4772 or customercare@talkamericaservices.com or in writing at 2134 W Laburnum Ave., Richmond, VA 23227.

Sincerely,

Talk America Services, LLC